

REMARKS

Claims Status

Applicant acknowledges, with appreciation, the allowance of claims 34-41. Claims 25-41 are now presented for examination, with claims 25 and 34 being in independent form.

Claims 25, 27, 29, 32, 34 and 38 have been amended. Support for the amendments to independent claim 25 may be found, for example, at pg. 11, lines 2-5, pg. 11, lines 26-30 and pg. 14, lines 20-25 of the specification as originally filed. The amendments to claims 29, 32, 34 and 38 correct typographical errors, and are cosmetic in nature. No new matter has been added. Reconsideration of the application, as amended, is respectfully requested.

Overview of the Office Action

Claims 25-27 and 30-33 stand rejected under 35 U.S.C. §103(a) as obvious over GB 2366705 (“*Shi*”) in view of U.S. Patent No. 6,961,322 (“*Viola*”) and “Digital Cellular Telecommunications System (Phase 2+) (GSM); Universal Mobile Telecommunications System (UMTS); General Packet Radio Service (GPRS) Service Description; Stage 2 (3GPP TS 23.060 version 3.8.0 Release 1999)”, ETSI TS 123 060, V3.8.0, June 1, 2001, pgs. 134-135 (the “GSM Standard”), U.S. Pub. No. 2003/0026232 (“*Uskela*”) or U.S. Pub. No. 2004/012723 (“*Hurtta*”).

Claims 28-29 stand rejected under 35 U.S.C. §103(a) as obvious over *Shi* in view of *Viola* and GSM Standard *Uskela* or *Hurtta*, and further in view of U.S. Patent No. 6,654,607 (“*Shobatake*”).

Applicant has carefully considered the Examiner’s rejections and the comments provided in support thereof. For the following reasons, Applicant asserts that all claims now presented for examination in the present application are patentable over the cited art.

Patentability of Independent Claim 25 under 35 U.S.C. §103(a)

Independent claim 25 has been amended to incorporate a feature from dependent claim 27. Specifically, independent claim 25 has been amended to recite, *inter alia*, “after checking to determine whether a user address of said mobile terminal exists in at least one incoming call request management interface connected to said at least one address assignment server to prevent assignment of a second address to corresponding to the same mobile terminal, after verifying accessibility to said mobile telecommunications network in at least one home location register of said mobile terminal communications network”. Support for the amendments may be found, for example, at pg. 11, lines 2-5, pg. 11, lines 26-30 and pg. 14, lines 20-25 of the specification as originally filed. No new matter has been added.

The claimed invention is directed to establishing a connection to a mobile terminal via a DNS server and a Radius server for the address allocation. In the claimed system, the mobile terminal is already connected to a communications network. Thus, an address of the mobile terminal already exists, and there is a desire to refrain from issuing a second address for the mobile terminal. Consequently, the claimed “system is configured to set up at least one additional connection from at least one of said communications networks to the mobile terminal after said mobile terminal has sent a first command message to request identification of the mobile terminal from an application server to at least one domain name server disposed in said communications network ... after checking to determine whether a user address of said mobile terminal exists in at least one incoming call request management interface connected to said at least one address assignment server to prevent assignment of a second address corresponding to the same mobile terminal, after verifying accessibility to said mobile telecommunications network in at least one home location register of said mobile terminal communications network”. That is, the claimed system ensures that another IP address is not provided by another

communications network when another connection is established from the additional communications network to the mobile terminal. The claimed invention thus advantageously prevents the assignment of another IP address by the communications network for the second connection.

Each of the cited references, *inter alia*, *Shi* and the GSM standard, describe the connection from a mobile terminal to a specific piece of external equipment, such as a network, a server or the like. For example, *Shi* teaches that the GGSN equipment is only contacted when performing a connection. However, the GGSN equipment of *Shi* has no knowledge of all address allocation requests.

The GSM standard, on the other hand, is described in Applicant's instant specification. That is, the instant specification describes that the GSM standard discloses the functionality of a "Network-requested PDP Context activation" (see pg. 2, lines 1-25 of the originally filed specification). The instant application implements this functionality pursuant to performing the address search of SGSN equipment in the mobile network for the creation of a PDP Context link (see page 19, lines 35 to 36). However, the claimed invention is specifically directed to the activation of an incoming call to a mobile terminal only after a mobile terminal has been identified in at least one address assignment server to which a communications network will establish an additional connection (see pg. 10, lines 15-32 of the specification) for verifying technical accessibility and user rights (see pg. 11, lines 32-34 and pg. 16, lines 2 to 9) and for checking to determine whether a user address of the mobile terminal exists in at least one incoming call request management interface that is connected to the at least one address assignment server (see pg. 11, lines 2-5) to prevent assignment of a second address corresponding to the same mobile terminal (see pg. 14, lines 20-25).

The Examiner (at pg. 6 of the Office Action) asserts that:

the combo [of *Shi/Viola* and the GSM standard, *Usekla* or *Hurtta*] teaches claim 25, wherein said system comprises *at least one incoming call management interface (34) connected to said address assignment server situated in said communications network (20, 21, 22)* and adapted to assign at least one network address to said mobile terminal (10) after processing of said user address on the basis of data from a second command message received from said user address search interface (*Shi* teaches a mobile user connected to a mobile network, eg. BTS/BSC/MS, whereby any/all in/outbound calls are routed to the mobile based on either it's IMSI and/or TCP/IP Address). (Emphasis Added)

Applicant disagrees that the combination of *Shi/Viola* and the GSM standard, *Usekla* or *Hurtta* achieve applicant's system recited in amended independent claim 25.

Viola relates to “a method for managing dynamic internet address leasing” (see col. 1, lines 7-8). According to *Viola*, the “method manages an internet protocol address and time of validity. The method obtains (52) the IP address and validity time period for a mobile station (10). The IP address and validity time period are transmitted (53) to the mobile station (10). Prior to expiration of the validity time period the network (20) renews the IP address for a new validity time period” (see Abstract). *Viola* thus teaches a method for granting a mobile terminal with access to a network for a specific period of time.

Usekla, on the other hand, relates to a “method for reserving quality of service (QoS) in a wireless telecommunication system, which comprises at least one mobile station, a support node serving the mobile station, and a data terminal communicating with the mobile station”. According to *Usekla*, QoS is reserved and maintained by transmitting path messages and reservation messages between QoS protocol entities of the mobile station and the data terminal” (see Abstract). *Usekla* therefore has all to do with provide a high QoS level, i.e., a level of quality associated with the service.

However, there is no teaching or suggestion in *Viola* and *Uskela* with respect to a system that is configured to prevent assignment of a second address corresponding to the same mobile terminal, in the manner recited in amended independent claim 25. Therefore, *Viola* and *Uskela* fail to provide what *Shi* and the GSM standard lack.

In general, the quantity of available addresses in a conventional communications system is limited. Therefore, a problem exists in such conventional communication networks with respect to wasting addressing resources. The claimed invention therefore advantageously solves this problem by preventing the assignment of another IP address by the communications network for the second connection.

Moreover, the claimed method and system solve a problem that extends beyond the simultaneous connection of a mobile terminal with several communication networks. For example, the claimed invention, firstly, solves how to provide an incoming connection to a mobile terminal and, secondly, solves how to manage simultaneous connections with outgoing and incoming calls. The system of amended independent claim 25 utilizes home location (HLR) equipment to manage the addressing for the outgoing calls, whereas the addressing for incoming calls is managed by GGSN equipment.

In accordance with the claimed invention, the incoming call request management interface prevents the mobile terminal from assigning two addresses for the same network. Moreover, different interfaces are provided specifically for the connection via an incoming call request dialogue with different equipment of the communications networks to verify the network address, after processing the user address of the mobile terminal in accordance with the steps recited applicant's allowed method claims 34-41.

The combination of the cited art fails to teach or suggest a system that could achieve the foregoing advantages that are encompassed by the system recited in independent claim 25.

In view of the foregoing, amended independent claim 25 is patentable over the combination of *Shi*, *Viola*, the GSM standard, *Usekla* and *Hurtta* for at least this reason. Withdrawal of the rejection under 35 U.S.C. §103(a) is therefore requested, and a notice to that effect is earnestly solicited.

Patentability of Dependent Claim 28 and 29 over the Prior Art under 35 U.S.C. §103

The Examiner (at pg. 6 of the Office Action) acknowledged that the combination of *Shi*, *Viola*, the GSM standard, *Usekla* or *Hurtta* fails to teach or suggest the “at least one access control interface (35)” recited in dependent claim 28, and the “at least one access authorization interface (14)” recited in dependent claim 29, but states that these features would have been obvious based on the teachings of *Shobatake*.

Applicant disagrees that any combination of the cited references achieves the claimed invention. There is nothing in *Shobatake* to cure the above-noted deficiencies concerning the system of amended independent claim 25.

Shobatake relates to “a system and method for communicating across various communications platforms” (see Abstract). *Shobatake* (col. 3, lines 64-66) describes the use of a unified mobility manager to register the location of a terminal with its home database in a foreign network. *Shobatake* (col. 3, line 66 thru col. 4, line 3) additionally describes that “the terminal may be found through interactions with its home database” and that “[f]urther, authentication, authorization, and accounting may be performed for a terminal outside its home network through accessing its home database”.

However, there is nothing whatsoever in *Shobatake* with respect to a system that is “configured to set up at least one additional connection from at least one of said communications ... after checking to determine whether a user address of said mobile terminal exists in at least one incoming call request management interface connected to said at least one address

assignment server to prevent assignment of a second address corresponding to the same mobile terminal, after verifying accessibility to said mobile telecommunications network in at least one home location register of said mobile terminal communications network,” as recited in amended independent claim 25.

The combination of *Shi*, *Viola*, the GSM standard, *Usekla* or *Hurtta* and *Shobatake*, therefore, fails to teach or suggest the recitation of recited in independent method claim 25, let alone in dependent claims 28 and 29. Dependent claims 28 and 29 are, accordingly, patentable over *Shi*, *Viola*, the GSM standard, *Usekla* or *Hurtta* and/or *Shobatake*. Reconsideration and withdrawal of the rejection of claims 28 and 29 under 35 U.S.C. §103 are requested.

Dependent Claims

In view of the patentability of independent claims 25 and 34, for at least the reasons presented above, each of dependent claims 26-33 and 34-41 is believed to be patentable therewith over the prior art. Each of dependent claims 26-33 and 34-41 additionally includes features that serve to still further distinguish the claimed invention over the applied art.

Conclusion

Based on all of the above, it is respectfully submitted that the present application is now in proper condition for allowance. Prompt and favorable action to this effect and early passing of this application to issue are respectfully solicited.

Should the Examiner have any comments, questions, suggestions or objections, the Examiner is respectfully requested to telephone the undersigned in order to facilitate reaching a resolution of any outstanding issues.

It is believed that no fees or charges are required at this time in connection with the present application. However, if any fees or charges are required at this time, they may be charged to our Patent and Trademark Office Deposit Account No. 03-2412.

Respectfully submitted,
COHEN PONTANI LIEBERMAN & PAVANE LLP

By


Edward M. Weisz

Reg. No. 37,257

551 Fifth Avenue, Suite 1210

New York, New York 10176

(212) 687-2770

Dated: June 23, 2008